

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JASON ZUHL,

Plaintiff,

vs.

DEPUTY JASON HASKINS,
in his individual and official capacity.

Case No. 12-1380
Hon. Robert J. Jonker
Mag. Ray Kent

Defendants.

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PLAINTIFF'S PROPOSED VOIR DIRE

1. In the trial of this case, the parties are entitled to have a fair, unbiased and unprejudiced jury. If there is any reason why any of you might be

biased or prejudiced in any way, you must disclose such reason when you are asked to do so. It is your duty to make this disclosure.

2. Have you heard or read or know anything about the subject matter of this trial?

3. Do you know the Plaintiff in this case, Jason Zuhl?

4. Do you know his ex-wife Anne Mathis Zuhl?

5. Do you know Defendant Jason Haskins, who is a Deputy with the Berrien County Sheriff Department?

6. Do you know or have you had encounters with any members of the Berrien County Sheriff's office?

7. Do any of your family members or close friends or associates know the Defendant or any other members of the Berrien County Sheriff's office?

8. Have any of your family members or close friends or associates had encounters with any members of the Berrien County Sheriff's office?

9. Are or were any members of your family or close associate's police officers? Jail guards? Military police? Customs and Border patrol or Homeland Security officers?

10. Do you have any training or experience in law enforcement?

11. Do any of your family members or close associates have any training or experience in law enforcement?

12. Do you know any of the other prospective members of the jury?

13. Do you know any of the attorneys or any members of their families? The names of the attorneys are as follows:

Hugh M. Davis and Cynthia Heenan of Constitutional Litigation Associates, PC.

James M. Straub and Sarah J. Hartman of Straub, Seaman & Allen, P.C.

James T. McGovern with Berrien County

14. Do any of you believe there are too many lawsuits filed?

15. Have you ever been a witness in a case?

16. Have you ever been a victim of a crime?

17. Does your job cause you to work with any law enforcement officer or agency?

18. Have you ever received any training in law enforcement or taken any courses in law enforcement?

19. Do you have any close relatives who are attorneys?

20. Do you have any legal training?

21. Would you tend to believe a police officer over a private citizen?

22. Have you or a member of your immediate family ever been employed by any governmental agency?

23. Are you related to or friends with any law enforcement officer, prosecutor or security officer?

24. Have any of you served on a jury? If so, when, how many times, what was the nature of the case? Did you reach a verdict? What was it?

25. Do any of you have a problem awarding damages against a governmental body or employee if someone's civil rights were violated?

26. Would any of you tend to give greater weight to the statements of a public official simply because of his/her position?

27. Do you having any preconceived ideas about this type of case which would affect your judgment as a fair and impartial juror?

28. Do you have any health issues, hearing, sight problems, family issues or personal concerns which would affect your ability to give your full attention in this case?

29. Is there any reason why you feel you cannot be a fair and impartial juror in this case?

30. Have you or any one in your immediate family ever held any public office?

31. Have you served in the military? If so, details.

32. Do you watch TV shows or movies about crime and law enforcement? If so, which ones? How often? If so, are you willing and able to

set aside any understanding of the law that you may have from watching such shows and accept and apply the law as will be instructed by the judge in this case?

Respectfully submitted,

/s/Cynthia Heenan
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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2017, I electronically filed *Plaintiff's Voir Dire* along with this *Certificate of Service* with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

- **Hugh M. Davis , Jr**
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By: /s/Jillian R. Rosati
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